

STEVE SISOLAK
Governor

Sagebrush Ecosystem Program

201 Roop Street, Suite 101
Carson City, Nevada 89701
Telephone (775) 684-8600
Facsimile (775) 684-8604

www.sagebrusheco.nv.gov



Kelly McGowan, Program Manager
Dan Huser, Forestry/Wildland Fire
Kathleen Petter, State Lands
Ethan Mower, Agriculture
Katie Andrie, Wildlife

STATE OF NEVADA
Sagebrush Ecosystem Program

August 20, 2019

Mike Worley
Environmental Manager
McEwen Mining Inc. – Gold Bar Mine
2215 North 5th Street
Elko, NV 89801

Dear Mr. Worley:

You may be aware that on April 29, 2019, the State of Nevada's Sagebrush Ecosystem Council adopted regulations requiring mitigation for impacts to GRSB habitat on all public lands that are the result of certain anthropogenic disturbances. Specifically the regulations require "Mitigation of residual direct or indirect anthropogenic impacts resulting in potential habitat loss or degradation as defined by the Nevada Greater Sage-Grouse Conservation Plan and the Nevada Conservation Credit System (CCS), within Greater Sage-Grouse Habitat Management Areas is required when the anthropogenic disturbance is subject to state or federal review, approval, or authorization, as ordered by Nevada Executive Order 2018-32, signed on December 7, 2018."

It is our understanding that the Record of Decision for the Gold Bar Mine assumes that a draft treatment plan would be developed within six months of the signed ROD for the Final EIS. It also states that a plan would be developed identifying unit-specific treatment plans that utilize approved treatment methods to address the goals and objectives for each unit and to achieve **net conservation gain** depending on on-the-ground conditions. It is well beyond six months and to date we do not have any record of where these treatments units will occur, when the treatments will begin, or what unit of measure is intended to be used to achieve net conservation gain.

The Sagebrush Ecosystem Program would like to be kept informed on the development of a mitigation strategy so that we may assist you in achieving net conservation gain with your mitigation. We have several credit projects within fairly close proximity to your mining operations that may serve as offsets to the impacts from the mine. I would like to meet with you to review the CCS site analysis that was completed for the Gold Bar Mine and the number of debits associated with the project. The CCS tools can also be used to help identify areas of treatment that will likely yield the greatest amount of conservation, including conservation projects on public land.

We intend to use the CCS tools to estimate the number of credits generated from the relevant conservation sites in comparison with the number of debits calculated for the mining project. This will

allow us to meet our reporting requirements for mitigation being conducted statewide within greater sage-grouse management areas.

Please contact me at your earliest convenience so that we can set a date and time to review and discuss your options for achieving net conservation gain and the protection of Nevada's sagebrush ecosystem.

If you would like additional information on the Conservation Credit System, please visit our website at sagebrusheco.nv.gov, or contact me at the information below. I have also included a copy of the approved regulations for your review. I look forward to your response.

Sincerely,

Kelly McGowan, Program Manager
201 S. Roop Street, Ste. 101
Carson City, NV 89701
775.684.8600
kmcgowan@sagebrusheco.nv.gov

CC: Christine Gabriel, BLM; Alan Jenne, NDOW; Jon Raby, State Director, BLM
Attachment: Mitigation Regulation